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DIVISION II

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STATE OF WASHINGTON

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No. 51864-3-II

WASHINGTON STATE
COURT OF APPEALS
950 BROADWAY #300
TACOMA, WA 98402-4454
PIERCE COUNTY

COURT OF APPEALS,
DIVISION II
OF THE STATE OF WASHINGTON

Dale Santos, Appellant Petitioner

v.

Manivanh Sayasit, Respondent

BRIEF OF PETITIONER

Dale Santos
Petitioner
P.O. Box 24562
Seattle, WA 98124

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1. THE TRIAL COURT ERRED IN IDENTIFYING THE SCOPE OF THE GUARDIAN AD LITEM.	
A. The guardian ad litem investigates one child not both.	
2. THE TRIAL COURT ERRED ITS FINAL DECISION.	
A. The trial court erred its final decision by not reviewing the submitted documents earlier in this case such as declarations stating the fathers parenting time spent with children, with the trial courts minimal time to review them.	
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A. Assignments of error

Assignments of error

1. The trial court erred its final decision by not identifying the scope of the guardian ad litem investigations error, however this case consists of two children the scope of the investigation is one child.
2. The trial court erred its final decision by not carefully reviewing all aspects of this particular case.

Issues pertaining to assignments of error

The issues that pertain to this case is that of the guardian ad litem and the trial courts final decision. Whether the court abused its decision for the best interest of the children, the court did not have sufficient time to review the length of this case.

B. Statement of the case

In 2017 I responded to a motion regarding the best interest of my children on my part, prior to these events the children had lived with their mother at their grandmothers house where i had spent every day with them providing them with every day essentials even over the weekends on occasion when the mother was away with her lover. When the mother moved in with her lover, I knew how these situations can be, and how it can impact the well-being of my children now and in the future. Rarely seeing my children every other weekend would cause stress for myself-

and my children. However I am doing everything I can to prevent this happening. The guardian ad litem was limited to its investigation RP 16. My children need a father in their life not a part time father every other weekend. I moved to Washington in 2016 to be with my children, I thought it would be the best thing to do for my children they have family in Washington also in California, to have parents in two different states would be difficult to manage and I knew it would be a lot for my children to handle. I visited with my children 4-6 times per year since 2010 when Mrs. Sayasit moved to Washington. When I lived in California myself and Mrs. Sayasit would take turns paying for airfare and travel expenses. It was in 2016 when i realized moving to Washington was the best option for myself and my children, and I am trying my very best to provide for my children, I had found my first job as a dishwasher and was very excited about it 1 week after I came here. In October 2016 i had found my second job and worked there for 2 years 3 months before putting in my two week notice. I now have finally found a job that is of my future interest.

C. Argument

In trial court the assumption of a fair trial would take place for the best interest of the children, and abuse of discretion. The trial courts order of the parenting plan, residential schedule, and child support CP 1-40, differs from the actual time spent with children before the court action had begun.

D. Conclusion

The appellant respectfully requests that the court reverse the trial court's ruling and grant me custody of my children.

March 14, 2019

Respectfully submitted,



Dale Santos, petitioner

COURT OF APPEALS, DIVISION II
OF THE STATE OF WASHINGTON

In re:

Dale Santos

Appellant

No. 51864-3-II
Declaration of mailing
(DCLRM)

Vs

Manivanh Sayasit

Respondent

I, Dale Santos, declare that I am at least 18 years of age and the petitioner to this action and:

On March 14, 2019 I deposited into the U.S mail a copy of the following documents:

Appellant Brief

I certify (or declare) under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Signed at Seattle, Washington on 03/23/ 2019.



Dale Santos

Declaration of mailing

